

(212) 332-8900

BRADLEY D. SIMON
KENNETH C. MURPHY
MICHAEL LEVIN

TERRENCE JOHNSON

SIMON & PARTNERS LLP

THE FRENCH BUILDING
551 FIFTH AVENUE
NEW YORK, NEW YORK 10176

www.sinonlawyers.com

FAX: (212) 332-8909

NEW YORK
WASHINGTON, D.C.
PARIS

November 15, 2017

Via ECF

The Honorable Joanna Seybert
United States District Court
Eastern District of New York
944 Federal Plaza
Central Islip, New York 11722

Re: United States v. Jack Vitayanon
Criminal Docket No. 17-080 (JS)

Dear Judge Seybert:

We represent Jack Vitayanon, the defendant in the above referenced case. As the Court is aware, Mr. Vitayanon is currently undergoing in-patient drug treatment at Integrity House, located in Newark, New Jersey. I am writing to respectfully request that Mr. Vitayanon be granted leave to utilize of a twenty-four hour pass offered to him by Integrity House. The pass is proposed for tomorrow, November 16, 2017.

Integrity House offers eligible patients the ability to spend twenty-four hours (from 9 a.m. through 9 a.m.) off-site from its in-patient facility. Integrity House issues these passes for a limited set of dates. Mr. Vitayanon has qualified for such a one-day pass tomorrow.

U.S. Pretrial services officer Brian Manganaro has advised me that he has no objection to Mr. Vitayanon receiving a pass so long as his itinerary for the day is provided. I am hereby attaching Mr. Vitayanon's proposed itinerary. As set forth in the itinerary, Mr. Vitayanon will be calling into Integrity House every four hours. Mr. Vitayanon's mother, Kay Vitayanon, who has attended court conferences and been very supportive of her son's efforts to get treatment, will be responsible for furnishing his transportation.

Accordingly, it is respectfully requested that Your Honor grant Mr. Vitayanon's request to receive a twenty-four hour day pass from Integrity House.

Finally, I apologize for the short notice of this request. It only recently came to my attention that this opportunity was possible for Mr. Vitayanon.

Respectfully Submitted,


Bradley D. Simon
SIMON & PARTNERS LLP
551 Fifth Avenue, 31st Floor
New York, New York
T) (212) 332-8900
F) (212) 332-8909
bradsimon@simonlawyers.com

Enc.

Approved.

SO ORDERED:	
	JOANNA SEYBERT
Joanna Seybert, USDI	
Dated: 11/15/2017	
Central Islip, NY	